
Design Stewardship Implementation

2014 Delegation

Division of Design, Department of Transportation

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INTRODUCTION

Overview

The purpose of the Design Stewardship Agreement is to provide a contractual document which transfers the decision making authority from Caltrans Headquarters Division of Design (DOD) to individual districts and defines how the district and DOD will operate together with Stewardship delegation.

As related to the Design Stewardship Agreement the DOD has defined stewardship as follows:

Design Stewardship is about the co-management, co-administration, and co-responsibility of the design standards, policies and procedures the department uses to manage the design of the state transportation system. Stewardship consists of a delegation of responsibilities and a mutual accountability of assuring that those responsibilities are executed. Stewardship is a joint responsibility for the development and implementation of the state transportation system. Delegation of responsibilities and mutual accountability are defined as follows:

The **delegation of authority** means the transfer of approval authority from DOD to the district for specific project level decisions as defined in this agreement.

DOD will retain some project level decisions and all program level corporate activities related to delivering the state transportation program, such as leadership, technology deployment, technical assistance, training, problem solving, performance management and process improvement.

Mutual accountability refers to accountability shared by both parties and is managed by the performance measurement, risk management, technical consultation, dispute resolution, and the sharing of best practices between DOD and districts.

Stewardship, as outlined in this document, is exercised through program management and project level activities.

The baseline Design Stewardship Agreement, as well as the Negotiated Design Stewardship Agreement Delegations of Authority, delegates only DOD approvals and does not include approvals needed from other department divisions. The delegations presented in this document are consistent with but do not affect the delegations between FHWA and Caltrans.

DESIGN STEWARDSHIP AGREEMENT PLAN

Overview

The Design Stewardship Agreement plan is based on the following criteria:

- A uniform baseline approval authority for all districts
- The allowance for additional approval authorities to individual districts when warranted and mutually agreed upon
- A consistent format for stewardship and performance measurement
- Clarity approval authority responsibility

The Design Stewardship Agreement is intended to be periodically amended and updated as the needs and goals of each individual district change over time.

Roles and Responsibilities

The following roles and responsibilities with regards to the Design Stewardship Agreement pertain to the Caltrans DOD, except where otherwise noted. The Project Delivery Coordinators and other DOD managers will continue to provide approvals for non-delegated authorities as needed. The three main bodies to implement the Design Stewardship Agreement are the individual Districts, the DOD Resource Center (see Figure 1), and the DOD Office of Performance Management.

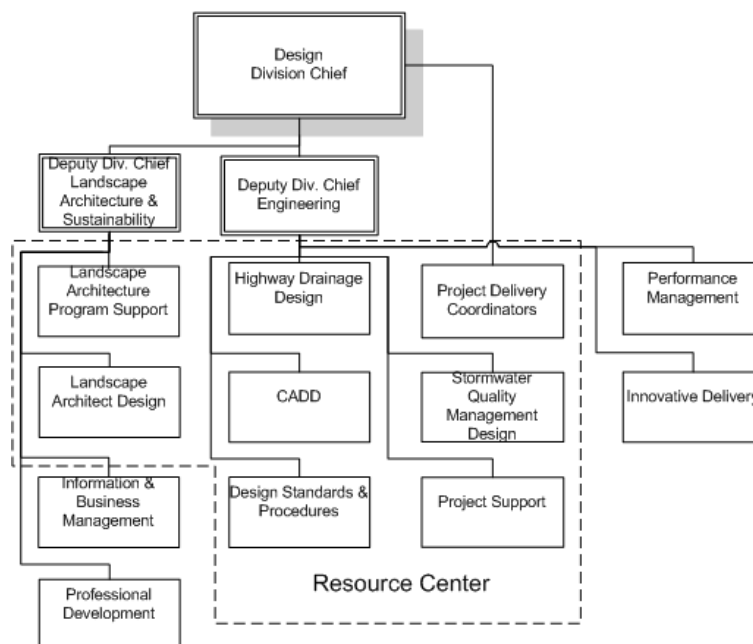


Figure 1 DOD Organization Chart

Districts

Each district is expected to accept the baseline Design Stewardship Agreement Delegation Authority as presented below and will have the option to negotiate an increased level of authority beyond the baseline, reflecting their district needs. Each district will also be expected to provide an organizational structure to implement a Stewardship Quality Management Plan (SQMP) as part of the Design Stewardship Agreement. This SQMP will outline and define how the district will ensure adherence to the Design Stewardship Agreement.

Delegation of the Authorities through this Design Stewardship Agreement will transfer to the District Director. These delegations affect civil engineer works and are therefore subject to the Business and Professional code as defined in sections 6730-6731.1. If a District Director is not a registered Civil Engineer, further delegation is required in writing to the District/Regional manager responsible for the Design function. These delegations may further be delegated in writing within the design function, but not below the Supervising Transportation Engineer Level.

As noted before, the individual districts will have the opportunity to periodically amend the Design Stewardship Agreement, including the negotiated level of delegated authorities and the SQMP as needed in the future.

DOD Resource Center

The DOD Resource Center is a term applied to the expertise provided by the Project Delivery Coordinators, and subject matter experts in the DOD offices. These individuals will provide guidance and support for the districts with regard to delegated authorities of the Design Stewardship Agreement when called upon. It should be noted that the DOD Resource Center will provide subject matter expertise on topics such as geometrics, ADA standards, utility encroachments, encroachments, route matters (route adoptions, freeway agreements, etc.), CADD/GIS, hydraulics, stormwater, roadside management, and landscape design, among others. The Resource Center may call upon and coordinate other functional areas outside of the DOD Resource Center to assist in providing input and guidance.

The DOD Resource Center will develop strategies, tools and events that will share knowledge and foster the statewide consistent application of design standards and policies.

Office of Performance Management

The Office of Performance Management (OPM) will act to ensure that the individual Design Stewardship Agreements for each district are implemented. The OPM will conduct periodic reviews, measures compliance with each district SQMP, and specific

performance measures. The OPM acts as the custodian of the Design Stewardship Agreements and will coordinate future modifications of the agreements and/or SQMPs. These reviews will serve to identify areas of improvement or best practices of either DOD or districts. The OPM will coordinate with the Project Delivery Coordinators to facilitate change to the Stewardship Agreement.

Joint Roles and Responsibilities

It will be the joint role and responsibility of the above entities to abide by the agreed upon delegated authorities and SQMPs. It is the joint responsibility of the districts and Project Delivery Coordinators to determine any necessary further definition of delegated authorities not covered by the initial Design Stewardship Agreement and to document the decisions made (e.g. this would apply to projects with scopes that cross multiple facility types). There is an expectation that joint roles and responsibilities are determined by consensus; however when disagreements cannot be resolved, the dispute resolution process as prescribed in the Project Development Procedures Manual Chapter 21 will be followed.

Baseline Design Stewardship Agreement Delegation of Authority

The baseline Design Stewardship Agreement applies to all DOD approvals on conventional highways and expressways for all districts - refer to Appendix C. In addition, the following approval authorities apply to freeways and will be delegated to the districts:

- Approval of Freeway Agreements, Controlled Access Highway Agreements, and Route Adoption maps.
- Encroachments due to recycled water systems
- Denomination of freeway declaration for facilities operating as conventional highways and expressways or unconstructed routes
- Approval of exception to accessibility design standards in addition to local road connections at freeways
- Previously district delegated mandatory design exception approval authorities (enacted in 2013) as shown in the Highway Design Manual (HDM)

The following approval authorities are excluded from the baseline Design Stewardship Agreement and retained by the DOD:

- Project of Statewide Interest (POSI) as defined in Appendix A
- High-low underground utility risk policy approvals
- Longitudinal utility encroachments on freeways or expressways
- Non-utility encroachments
- Safety Roadside Rest Areas Master Plan

- Non-Standard Special Provision (NSSP) approvals within DOD.

Negotiated Design Stewardship Agreement Delegations of Authority

Each District has the ability to request additional delegation authorities beyond the baseline Design Stewardship Agreement outlined above. Additional Authorities as Negotiated by Districts may include, but are not limited to:

- All design approvals on freeways
- Longitudinal utility encroachments
- Hi-low underground utility risk policy approvals
- 2R Project Certification concurrence for freeway projects.

Conditions will be included in an appropriate SQMP which demonstrates a proven ability to responsibly manage the requested additional delegations.

STEWARDSHIP QUALITY MANAGEMENT PLAN

Overview

If an outcome is important enough to measure then it is important to manage, or consistent and predictable results cannot happen. The Stewardship Quality Management Plan (SQMP) will focus on how delegated DOD responsibilities are being managed with reviews to confirm the implementation of the SQMP and not on the district organization, structure, or size.

The profession of quality management has identified seven principles, shown in figure 2, with which to evaluate quality management practices.

Each of these principles requires clear processes to be followed as shown in Figure 3.

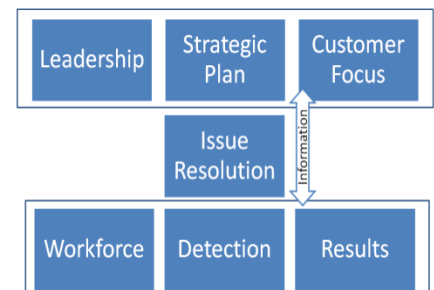


Figure 2 Quality Management Principles

The individual districts are expected to provide a comprehensive SQMP that will outline and define how they intend to carry out the Design Stewardship Agreement. The core principles of the SQMP are further discussed below. Guidelines are provided in Appendix B to give each district a starting point in developing an appropriate and successful SQMP.

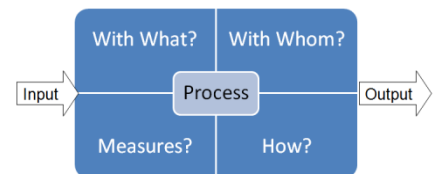


Figure 3 Process Requirements

Leadership

The leadership principle is defined as the processes performed by an individual (or individuals) responsible for establishing a vision and direction for an organization. These processes are customer focused that engage the workforce to achieve an organization's objectives.

Strategic Planning

Strategic planning is defined as the activities performed in collaboration with the organizational leadership, customers, stakeholders, and workforce in setting action plans and objectives monitoring and realizing the organization vision. Figure 4 displays the general concepts incorporated into a strategic plan.



Figure 4 Strategic Plan

Customer Focus

Customer focus is defined as the process that enables an organization to identify its current and future customer's interests, and facilitates the customers to engage.

Workforce

Workforce is defined as the process that enables the organization's employees to be successful in deploying the action plan.

Detection

Detection is defined as the processes that assess level of acceptability of the organization's products or services. This enables its workforce to identify improvements or best practices.

Issue Resolution

Issue resolution is defined as the processes that enable its workforce and leadership to collaborate on resolving systemic issues.

Results

Results are defined as the organizational performance and improvements in achieving its strategic objective.

Accountability

Accountability needs to focus on the effectiveness of the delegation process that is a qualitative assessment of how well the SQMP is executed. Issues to be evaluated include:

1. District self monitoring of their Stewardship Agreement in accordance to with their SQMP Issue Resolution and Strategic Plan principles.
2. DOD, Office of Performance Management (OPM) will perform the following tasks:
 - Conduct District Stewardship Agreement implementation assessment

- Update the performance measures
 - Adjust baseline or negotiated authorities SQMP's
 - Provide library of project examples, lessons learned, best practices, etc.
 - Determine necessary training
 - Assess and update the program risk register
 - Update DOD roles and responsibilities as they pertain to the Design Stewardship Agreement.
3. DOD and District develop future monitoring or assessment processes such as:
 - Performing satisfaction surveys.
 - Create a database to warehouse, and track affected projects for DOD
 - Use of an annual review to assess performance
 4. Use IQA analysis at different stages of project as data to evaluate implementation of SQMPs.

Performance Measures

A performance measure is a quantifiable scale, appropriately segmented, reports a trend over several time periods, provides beneficial indication, and reports equivalent comparisons. For this Design Stewardship Agreement, the performance measures initially are intended to be simple, clearly defined, measurable and effective in contributing to a mutually agreeable performance outcome. The following are the performance attributes and initial performance measures that the OPM will use to assess during periodic reviews:

Efficiency - A measure of how efficient the process is to those that work with it (i.e., minimal duplication of effort and/or issues pertaining to input resources such as schedule and cost). *How well does it minimize effort and waste?*

- Completion of design exception documentation per the PDPM
- Completion of decision making documentation

Clarity - A measure of how transparent the delegation process (standards, procedures and rationale) is to those that work with it (i.e., easily adhered to, documented, communicated, and easy to use). *How well is it understood and practiced?*

- Verifying that appropriate documentation of the delegation process decisions are in place (following standards & procedures)
- Verifying that appropriate documentation of the decisions made are in place (providing decision rationale)

Consistency – A measure of how consistent the district delegation process is throughout the department. *Are the guidance and policies applied appropriately?*

- Verifying that appropriate documentation meets the applicable guidance

DOD/District Accountability - A measure of the District's adherence to the Design Stewardship Agreement and the SQMP. *How closely is the SQMP being followed?*

- Verify that the District is following its approved SQMP

Program risk registers to be reviewed and updated at the District/DOD level annually for risks associated with the delegation process.

List of Appendices

APPENDIX A - Consideration of Projects of Statewide Significance (POSI)

APPENDIX B - Stewardship Quality Management Plan - Design Stewardship Agreement signature page

APPENDIX C - HDM, PDPM & DIB Delegation Matrices

APPENDIX D - Delegation Determination Flowchart

APPENDIX A - Consideration of Projects of Statewide Interest (POSI)

Projects of Statewide Interest (POSI) are mutually agreed upon by the District and DOD during the planning phase. The POSI criteria may consist of the following categories:

1. Controversial or High Visibility projects

Defined as projects which may have an unusual or politically sensitive interface with a bordering state or Mexico or a project which has the attention of Governor's Office, Legislature, Congress, and/or Agency.

2. Pilot or other projects having unique design features of statewide significance

Defined as projects which may have technically unique or experimental features not specifically addressed in existing guidance and could create a statewide precedent. The projects listed below are provided as examples.

- Bus on shoulders pilot
- Diverging Diamond Interchanges

3. Invitational Projects

Projects where District/Region specifically requests, on a project by project basis and DOD retains specific design approval.

APPENDIX B – Stewardship Quality Management Plan (SQMP)

The purpose of this document is to help the district directorate, their staff and the Division of Design (DOD) set a framework for ensuring successful delegation. A management plan supports the delegation responsibilities by being uniformly applied, consistent, with defined roles and responsibilities of ALL involved, and is scalable allowing flexibility within agreed upon conditions. There are seven quality management principles that guide a well-managed organization. These principles are supported by management to ensure the resources are provided to be successful. These seven principles are leadership, strategic planning, customer focus, workforce, detection, issue resolution, and results.

Leadership, strategic planning, and customer focus are the trio of systems or processes that the district leadership upon assuming its delegation responsibility ensures the customer requirements and expectation are met.

Workforce, detection, and results are the trio of processes the district organization uses to meet delegation responsibilities.

Issue Resolution is the mechanism to help district leadership make improvements to the management plan.

Supporting these principles is a well thought-out process that contains input followed by the process requirements (1. Needed materials, tools or equipment; 2. Qualified staff needed; 3. Instructions or methods; and 4. Goals and targets) and lastly the output, document or service. Documenting these processes allows for current and future staff, management, and leadership to provide direction and expectations of all involved.

Leadership:

To achieve approval of delegation authority the District will consider the following:

- Who, if any, will be sub-delegated responsibility from the District Director?
- How will the district delegation responsibility be championed by the District directorate?
- What are the plans or activities for engaging the District staff?
- What are the District's strategies for engaging the DOD, other divisions, and FHWA once the design decisions are delegated to the District?
- What is the frequency and method to determine the effectiveness of the stewardship agreement?
- What is the contingency plan for leadership and delegation changes?
- Is there a published document supporting this delegation?

Example Submittal: Upon approval, the District Director will sub delegate the approval authority to the District Design Deputy (directorate). In doing so, the directorate will engage the district staff affected by the stewardship agreement on these changes. The director and the delegate will seek to ensure the district commitment for the delegated responsibility by meeting with staff at its quarterly staff meeting. In addition, the directorate will be working with the DOD to formulate future delegations. Lastly, in the event of changing leaders a set of protocols will be posted to ensure transitions are in place.

Strategic Planning:

To achieve approval of delegation authority the District will consider the following:

- How is the delegation authority included in the district strategic plan?
- What is the deployment strategy?
- How will improvements to the deployment strategy be reported and communicated?
- What are key indicators or known issues that will be monitored?
- What are the resources needed from DOD or other divisions to deploy the strategy?
- Who will be responsible for monitoring, and reporting the deployment plan?

Example Submittal: Upon approval, the directorate will review the current strategic plan. The district strategic plan will incorporate the delegation responsibilities and be part of the strategic development and review sessions scheduled after for each quarter. Key indicators will be reported by the design deputy on current progress and changes to the delegation responsibilities. The key indicators will be summarized as planned in the subsequent results areas. Known issues are to assure statewide consistency of the delegation is being applied, transitions to the new practice, and sustaining approval authority. The directorate will work with DOD to identify training needs and other resource needs to deploy the strategy. Other Division's affected by the delegation will need be described in the subsequent plan to engage customers as needed.

Customer Focus:

To achieve approval of delegation authority the District will consider the following:

- In addition to the Division of Design, who are customers of the delegation authority?
- In addition to the Division of Design who else is responsible for delegation authority?
- Who are the stakeholders of the delegation authority?
- What are the customer and stakeholder interests affected by the delegation authority?
- How will the customers and stakeholder interests be documented and managed?
- How will customers be engaged in risks, issues, and improvements of the delegation authority?

Example Submittal: The district directorate will work with the Division of Design on policy application for its delegated responsibilities. Other corporate customers that may be affected with the delegation are the Division of Transportation Planning, Environmental Analysis, Traffic Operations, and Maintenance. Each will be coordinated with the planned delegation strategy and discuss these interests as they relate to delegation responsibility. These interests will be used to formulate district process requirements in its delegation strategy and to make improve changes. These interests will be reviewed as part of the delegation strategic planning meetings. FHWA is a stakeholder of the delegation. The District will work with the Division of Design and FHWA on protocols and procedures in ensure their interests are documented. Local partners involved in the planning and designing of improvement projects on the state highway system are stakeholders of the delegation authority. Their interests and concerns will be captured through the districts directorate meetings and forums. They will be included, as needed, for future improvements and training described in the workforce below.

Workforce:

To achieve approval of delegation authority the District will consider the following:

- Beyond district design staff, who else in the district is affected by the delegation authority?
- Beyond district design staff, who else in the district is responsible for the delegation authority?
- What is the plan to address and update staff on the delegation authority?
- What are the training needs for current and future staff regarding the delegation authority?
- Where are the process requirements, documentation, and verification or checks for staff to perform?
- What are the requirements to begin a process? And end a process?
- What are expected criteria to engage DOD?

Example Submittal: The District will use its project work plans to determine which projects and staff are affected by the delegation authority. Anticipated projects and impacts will include collaboration with the permit office, maintenance design, electrical design, landscape architecture, storm water, hydraulics, IQA staff, and project management to be familiar with delegation responsibilities and affected changes. The primary focus for delegation approval for non-standard features is the district designer seniors and project engineers. Guidance for design exception approval changes will update the published district advisory approval process found in the District website. District, with the assistance of DOD will devise criteria or requirements that require DOD involvement to clarify policies, ensure training consistency on policies, and help resolve issues brought by the District staff.

Detection:

To achieve approval of delegation authority the District will consider the following:

- Is there repository where the delegated responsibilities are to be followed by staff?
- In addition to performing audits, will there be independent district resources to be responsible to ensuring the application of consistent and uniform delegation responsibilities?
- What are the interim checks needed to be performed by staff, independent staff, and the approving party?
- If the delegation process needs to be circumvented or accelerated, what is the contingency process that will be followed?
- What are the required documentations that will be monitored to ensure consistency?

Example Submittal: Upon delegation approval to the District, the Directorate in cooperation with DOD staff will provide written and published district guidance, procedural requirements for implementing the delegation responsibility. The district will utilize a subject matter expert, in collaboration with the DOD that is independent from the workforce involved in decision borne from the delegation. The subject matter expert is responsible to monitor the district delegation responsibilities by reviewing and guiding district staff on the district procedural requirements.

Issue Resolution:

To achieve approval of delegation authority the District will consider the following:

- What is the process to capture systemic issues related to the delegation responsibility?
- What is the plan for defining, documenting, and implementing solutions to issues that have program wide impacts?
- What is the process to mitigate current and future improvements to the delegation responsibility process?
- What is the process to get the Directorate and DOD addressing systemic issues related to the delegation responsibility?
- Is there a process to document recurring issues affected by the delegation responsibilities?

Example Submittal: Upon the District delegation approval, the Directorate in cooperation with DOD will provide written documentation on the processes requiring DOD involvement. Such matters may include delegation responsibilities conflicting with customer and stakeholder interests. The Directorate will use the strategic planning assessment to monitor the trends and seek future improvements by monitoring systemic issues discovered in deploying its delegation authority.

Results:

To achieve approval of delegation authority the District will consider the following:

- What are measures and trends regarding the quality, quantity, time, and cost of the delegation process?
- What are the measures and trends on the effectiveness of the delegation training?
- Besides time and cost, are there associated measures and trends that should be monitored?
- What are the leadership, customers, and workforce satisfaction measures and trends with the delegation responsibility?
- What are the measures, and trends from audits and improvement strategies?

Example Submittal: There is no current performance management tool, or a system tool that allows for the real time assessment of the project decision and key factors that affect the decision making by management, customers, and staff. Ideal results should be generated from staff that can benefit by immediately learning, prioritizing, help strategic plan improvement, and engage leadership.

Some examples that could be used are:

- The document reviews comments by subject matter experts
- Satisfaction surveys by those involved in the process

Simple measures are provided but are only a start:

- Number of delegation approvals granted
- Number of reviews provided
- Cycle time to approve
- Comprehensive internal audits
- Documented guidance improvements
- Training pre/post assessments
- Number of people trained
- Number of staff at all staff meeting by leadership
- Strategic plan improvements
- Contacts with DOD

The following pages are the signature sheet and the proposed District Stewardship Quality Management Plan to be submitted for approval.

District Stewardship Quality Management Plan Approval

This Stewardship Quality Management Plan further delegates responsibilities established by the following documents:

The Director has delegated authority to the Chief Engineer dated December 10, 2012.

The District Director has been delegated authority dated _____.

The Chief Engineer has delegated authority to the Chief, Division of Design dated June 18, 2013.

If the District Director is not a registered Professional Engineer, further delegation is required in writing to the District/Regional manager responsible for the Design function. These delegations may further be delegated in writing to the Design Office Chief, not below the Supervising Transportation Engineer Level.

I, District Director of District __, request design delegation authority for the baseline described in the Design Stewardship Agreement document, and for the following design responsibilities:

(List of additional delegations, if any.)

The attached Stewardship Quality Management Plan describes how I will manage the delegated authority.

The Chief, Division of Design and the District Director mutually agree in carrying out the delegated authority as prescribed in the attached Stewardship Quality Management Plan. Implementation of this approval is effective July 1, 2015.

District Director

Date
Submittal of SQMP

Timothy Craggs, Chief, Division of Design

Date
Approval of SQMP

Stewardship Quality Management Plan

Overview:

Leadership:

Strategic Planning:

Customer Focus:

Workforce:

Detection:

Issue Resolution:

Results:

APPENDIX C – HDM, PDPM, and DIB Delegation Matrices

Baseline Stewardship Agreement Delegation Authority to the Districts					
Highway Design Manual (HDM)					
HDM Chapter/ Topic	Description	Conven- tional Highway	Express- way	Freeway ¹	Inter- state Freeway ¹
Advisory Design Standards	Advisory standards use the word "should" and are indicated by Underlining	DELEGATED	DELEGATED	DELEGATED	DELEGATED
2013 Delegated Mandatory Design Standards	Authority to approve deviations from this Mandatory Standard is delegated to the District Director as noted by ⁽²⁾ in the HDM	DELEGATED	DELEGATED	DELEGATED	DELEGATED
All Mandatory Design Standards (Except for Chapter 600) and 2013 Delegated Standards	Mandatory standards use the word "shall" and are printed in Boldface	DELEGATED	DELEGATED	NO	NO
Design Information Bulletins(DIB), Design Memorandum and Executive Orders					
DIB 77	Interchange Spacing	N/A	DELEGATED	NO	NO
DIB 79	2R Project certification Design guidance and Standards for Roadway Rehabilitation Projects and Certain Other Projects	DELEGATED	DELEGATED	NO	NO
DIB 82	Pedestrian Accessibility Guidelines for Highway Projects and ADA	DELEGATED	DELEGATED	NO	NO
DIB 83	Caltrans Supplement to FHWA Culvert Repair Practices Manual	DELEGATED	DELEGATED	NO	NO

¹ If not delegated, see the article "Negotiated Design Stewardship Agreement Delegations of Authority."

Project Development Procedures Manual (PDPM)					
PDPM 9	Modifications to existing access points or new access points to the Interstate System – Review & Approval required.	DELEGATED	DELEGATED	NO	NO
PDPM 9-Article 7	Traffic signal projects that introduce or perpetuate nonstandard conditions - Exceptions to Mandatory Design Standards	DELEGATED	DELEGATED	NO	NO
HDM-PDPM 82.2(1) - 15-7	Contract Design Changes (CCOs) - Exceptions to mandatory design standards.	DELEGATED	DELEGATED	NO	NO
PDPM 17	Existing Utility Longitudinal Encroachments - Exceptions may be granted, but must be approved.	DELEGATED	DELEGATED	NO	NO
PDPM 17	Utility Encroachments on Toll Bridges – All installations must have approval.	DELEGATED	DELEGATED	NO	NO
PDPM 17	Reclaimed Water Systems & Encroachments - All installations must have approval	DELEGATED	DELEGATED	NO	NO
PDPM 23	Approval Authority for Denominations, or Withdrawal of Denominations.	N/A	DELEGATED	DELEGATED	DELEGATED
PDPM 23	Reopen Route Studies – requires written approval.	DELEGATED	DELEGATED	NO	NO
PDPM 2,24	Conformance to Adopted Route - All deviations from the adopted route must be approved.	DELEGATED	DELEGATED	NO	NO
PDPM 2	Route adoption maps – Approval authority and exceptions to policy	DELEGATED	DELEGATED	DELEGATED	DELEGATED
PDPM 2, 24	Freeway Agreements and Controlled Access Highway– Execution authority.	N/A	DELEGATED	DELEGATED	DELEGATED
PDPM 24	"Project" or "Performance" Agreement – draft document requires review and approval.	DELEGATED	DELEGATED	NO	NO
PDPM 29	Highway planting policy – Exceptions require approvals.	N/A	N/A	NO	NO

PDPM 29	Separate landscape & roadway contract requirement – Exceptions to policy must be approved.	N/A	N/A	NO	NO
PDPM 29	Landscape Funding - Exceptions to policy must be approved.	N/A	N/A	NO	NO
PDPM 29	Plant establishment periods - Exceptions to policy must be approved.	N/A	N/A	NO	NO
PDPM 29	Landscape Maintenance Costs - Exceptions to this policy must be approved	N/A	N/A	NO	NO

APPENDIX D – Delegation Determination Flowchart

